

# **EXHIBIT C**

## **Defendants' Privilege Log**

1 NICHOLAS A. TRUTANICH  
 2 United States Attorney  
 3 District of Nevada  
 4 Nevada Bar No. 13644

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 6 Assistant United States Attorney  
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11 *Attorneys for the United States  
 12 and Anita Serrano*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 Michele Leuthauser, individually,  
 16 Plaintiff,  
 17 v.  
 18 United States of America; and Unknown  
 19 Transportation Security Administration  
 20 Officer,  
 21 Defendants.

22 Case No. 20-cv-479

23 **Defendants' Privilege Log**

24 Pursuant Fed. R. Civ. P. 26(b)(5)(A), Defendants United States of America and  
 25 Anita Serrano provides the following privilege log as part of its discovery disclosures:

<b>Document/Record</b>	<b>Privilege</b>
WITHHELD: CCTV footage (General Area South 1 0802) Date: 30 June 2019 Bates numbered: US000068PRIV	Sensitive Security Information – Confidential
WITHHELD: OIG Report of Investigation Bates numbered: US000204-379PRIV	Sensitive Security Information – Confidential <sup>1</sup>
REDACTED: Email re: Complaint of Sexual assault C1919770 Date: 5 August 2019 Bates numbered: US00021-22	Attorney-Client Privilege / Work-Product

26  
 27  
 28 <sup>1</sup> OIG is currently reviewing the report for privilege concerns.

1	REDACTED: Email re: Serrano statement and SSI Date: 5 August 2019 Bates numbered: US000032-35	Attorney-Client Privilege / Work- Product
2	REDACTED: Email re: Congressional Inquiry Dates: 27 August 2019 Bates numbered: US000023-24	Attorney-Client Privilege / Work- Product
3	WITHHELD: TSA SOP Bates numbered: US000069-203PRIV	Sensitive Security Information – Confidential

7 Respectfully submitted this 12th day of January 2021.

8 NICHOLAS A. TRUTANICH  
9 United States Attorney  
District of Nevada

10 /s/ Brianna Smith  
11 BRIANNA SMITH  
12 Assistant United States Attorney

13 **Certificate of Service**

14 I, Angel Villalpando, Legal Assistant, certify that the following individual was served  
15 with Defendants' Privilege Log on this date by the below identified method of service:

16 **U.S. Mail & Electronic Mail**

17 Jonathan Corbett, Esq.  
18 958 N. Western Ave., #765  
Hollywood, CA 90029  
[jon@corbettrights.com](mailto:jon@corbettrights.com)

20 Kristina S. Holman, Esq.  
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21 Las Vegas, NV 89120  
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22 *Attorney for Plaintiff*

23 Dated this 12<sup>th</sup> day of January 2021.

25 /s/ Angel Villalpando  
26 Angel Villalpando, Legal Assistant